

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a
BRAZOS LICENSING AND
DEVELOPMENT,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Civil Action No. 6:20-cv-00454-ADA
Civil Action No. 6:20-cv-00455-ADA
Civil Action No. 6:20-cv-00456-ADA
Civil Action No. 6:20-cv-00458-ADA
Civil Action No. 6:20-cv-00459-ADA
Civil Action No. 6:20-cv-00460-ADA
Civil Action No. 6:20-cv-00461-ADA
Civil Action No. 6:20-cv-00462-ADA
Civil Action No. 6:20-cv-00463-ADA
Civil Action No. 6:20-cv-00464-ADA

JURY TRIAL DEMANDED

**DECLARATION OF IRENE YANG IN SUPPORT OF DEFENDANT MICROSOFT
CORPORATION’S OPPOSITION TO CORRECTED RULE 26 MOTION FOR
PROTECTIVE ORDER BY NON-PARTY WADE & COMPANY (USA), INC.
AND BY WSOU INVESTMENTS LLC**

I, Irene Yang, declare as follows:

1. I am an attorney at Sidley Austin LLP, and counsel for Defendant Microsoft Corp. (“Microsoft”) in this matter. I am a member of the bar of this Court and admitted to practice law before this Court. I have personal knowledge of the facts set forth herein, and, if called as a witness, I could and would testify competently hereto. I am submitting this declaration in support of Microsoft’s opposition to Non-Party Wade & Company (USA), Inc. (“Wade”) and Plaintiff WSOU Investments LLC (“WSOU”) Motion for Protective Order.
2. Attached hereto as **Exhibit 1** is a true and correct copy of Microsoft’s Subpoenas to Third-Party Wade & Company (USA) Inc. (“Wade”). As of the date of this declaration, Wade

has not served objections to the deposition subpoena.

3. Attached hereto as **Exhibit 2** is a true and correct copy of email correspondence between counsel for Microsoft and counsel for Wade.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the proofs of service of Microsoft's Subpoenas to Wade, signed April 12, 2021.

5. Attached hereto as **Exhibit 4** is a true and correct copy of Wade's Statement of Information filed with the office of the Secretary of State of California on September 13, 2018.

6. Attached hereto as **Exhibit 5** is a true and correct copy of screenshots from Wade's website (<http://www.wadeandcompany.com/>), as accessed August 23, 2021.

7. Attached hereto as **Exhibit 6A** is a true and correct copy of an excerpt of the patent assignment record corresponding to Reel/Frame 044000/0136 through 044000/0290, downloaded from the USPTO's Patent Assignment database (<https://assignment.uspto.gov/patent/index.html#/patent/search>). The assignment record was excerpted to omit the USPTO Patent Assignment Cover Sheet spanning from Reel/Frame 044000/0053 through 044000/00135.

8. Attached hereto as **Exhibit 6B** is a true and correct copy of the patent assignment record corresponding to Reel/Frame 044000/0136 through 044000/0290, produced by WSOU in this litigation at Bates WSOU-MICAL-0001798-1952.

9. Attached hereto as **Exhibit 6C** is a true and correct copy of excerpts of the Patent Purchase Agreement between Alcatel Lucent, Nokia Solutions and Networks BV, and Nokia Technologies Oy, and Wade and Company, dated July 22, 2017. The document was produced by WSOU in this litigation at Bates WSOU-MICAL-0000025-44, 246-248, 398-400, 406-408, 468, 483-502. The document was excerpted to omit the voluminous patent lists attached to the

agreement schedules.

10. Attached hereto as **Exhibit 6D** is a true and correct copy of excerpts of the Amendment to the Patent Purchase Agreement, between Alcatel Lucent, Nokia Solutions and Networks BV, and Nokia Technologies Oy, and Wade and Company, dated August 2, 2017. The document was produced by WSOU in this litigation at Bates WSOU-MICAL-0000503-507, 709-712, 862-864, 870-872. The document was excerpted to omit the voluminous patent lists attached to the agreement schedules.

11. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts of the Local Rules from United States District Court, Central District of California, as retrieved from https://www.cacd.uscourts.gov/sites/default/files/documents/LocalRules_Chap1_12_20.pdf, on September 3, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 3, 2021 in San Francisco, CA.

/s/ Irene Yang

Irene Yang